

EXHIBIT “C”

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	MDL No. 1456
IN RE: PHARMACEUTICAL INDUSTRY)	Master File No. 1:01-CV-12257-PBS
AVERAGE WHOLESALE PRICE)	Sub-Category Case No. 1:08-CV-11200
LITIGATION)	
)	
_____)	

)	Judge Patti B. Saris
THIS DOCUMENT RELATES TO)	
<i>United States ex rel. Linnette Sun and Greg</i>)	
<i>Hamilton, Relators</i>)	
v.)	
<i>Baxter Hemoglobin Therapeutics and Baxter</i>)	
<i>International, Inc.</i>)	
_____)	

SUPPLEMENTAL RESPONSES OF RELATOR LINNETTE SUN
TO BAXTER HEALTHCARE CORPORATION'S FIRST SET
OF INTERROGATORIES

Relator Linnette Sun, pursuant to Rule 33 of the Federal Rules of Civil Procedure, subject to and without waiving her prior objections and responses to Baxter Healthcare Corporation's First Set of Interrogatories To Linnette Sun, provides supplemental responses as follows:

INTERROGATORY NO. 4

Have you obtained other Employment since any Adverse Employment Action? If so, for each new employment:


a. state the name of the employer;

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- c. invoiced them for \$22,000.00 on December 15, 2005; all additional invoices if any were reflected in Schedule Cs 2004, 2005 and 2006
- d. No benefits.
- a. Abbott Laboratories 100 Abbott Park Road, Abbott Park, Il 60024
- b. Commenced approximately in 2005
- c. Invoiced amounts were reflected in Schedule C 2005 and 2006
- d. No benefits.

Dated: November 17, 2011

Respectfully submitted.



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Counsel for Relator Linnette Sun

VERIFICATION

STATE OF PENNSYLVANIA)

COUNTY OF CH2STER

I the undersigned say: I am a plaintiff in the above entitled matter.

I have read the foregoing **SUPPELEMENTAL RESPONSES OF LINNETTE SUN TO BAXTER HEALT CARE CORPORATION'S FIRST SET OF INTERROGATORIES** and know the contents thereof. The information stated therein is true and correct to the best of my knowledge except for statements based on information and belief and as to those responses I believe them to be true and correct.

I declare under penalty of perjury in accordance with the laws of the State of Pennsylvania that the foregoing is true and correct.

Executed this 18 day of November, 2011, at Wayne, Pennsylvania.



LINNETTE SUN